

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

(01) DRAKE ADAM STOCKTON-KENNEY,
a/k/a “Drake Adam Kenney,” “Draco Kenney,”
“Drake Kenney,” “Draco Live,” and “Drizzy.”
[DOB: 9/24/1991]

(02) MARY CATHERINE SUMPTER,
a/k/a “Catie Sumpter.”
[DOB: 1/3/1994]

Defendants.

Defendants/Counts:

(01) Stockton-Kenney: 1-8.

(02) Sumpter: 1-2, 4, and 6.

No.

COUNTS 1 and 2

18 U.S.C. § 1951(a)

NMT 20 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class C Felony

COUNTS 3, 5, and 7

18 U.S.C. § 924(c)(1)(A)(ii)

NLT 7 Years Imprisonment

NMT Life Imprisonment

(Consecutive to All other Counts)

NMT \$250,000 Fine

NMT 5 Years Supervised Release

Class A Felony

COUNTS 4 and 6

18 U.S.C. § 2113(a) and (d)

NMT 25 Years Imprisonment

NMT \$250,000 Fine

NMT 5 Years Supervised Release

Class B Felony

COUNT 8

18 U.S.C. § 922(g)(1)

NMT 10 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class C Felony

FORFEITURE ALLEGATION

Criminal Forfeiture

18 USC § 981(a)(1)(C) & 28 USC § 2461

\$100 Special Assessment (Each Count)

INDICTMENT

THE GRAND JURY CHARGES THAT:

Introduction and Background

At all times relevant to this Indictment:

1. Check Into Cash, located at 1011 N. Morley St., Moberly, Randolph County, Missouri, engaged in financial transactions in interstate commerce.
2. World Finance, located at 2763 S. Clark St., Mexico, Audrain County, Missouri, engaged in financial transactions in interstate commerce.
3. Advance America, located at 807 S. Cherokee Dr., Suite 2, Marshall, Saline County, Missouri, engaged in financial transactions in interstate commerce.
4. Check 'n Go, located at 120 Steamboat Bend Shopping Center, Hannibal, Marion County, Missouri, engaged in financial transactions in interstate commerce.
5. Alliant Bank, located at 301 Prospect St., Pilot Grove, Cooper County, Missouri, engaged in full-service banking in interstate commerce.
6. Alliant Bank, located at 1910 Main St., Boonville, Cooper County, Missouri, engaged in full-service banking in interstate commerce.
7. The deposits of the Alliant Bank branches in Pilot Grove and Booneville were insured by the Federal Deposit Insurance Corporation.

COUNT 1

(Conspiracy to Interfere with Commerce by Robbery – Hobbs Act)

18 U.S.C. § 1951(a)

8. Between February 11, 2021, and August 10, 2021, said dates being approximate, within Cooper and Saline Counties, in the Western District of Missouri, and elsewhere, the defendants, **(01) DRAKE ADAM STOCKTON-KENNEY**, a/k/a “Drake Adam Kenney,”

“Draco Kenney,” “Drake Kenney,” “Draco Live,” and “Drizzy,” and **(02) MARY CATHERINE SUMPTER**, a/k/a “Catie Sumpter,” knowingly and intentionally combined, conspired and agreed with each other and others, known and unknown to the Grand Jury, to obstruct, delay and affect commerce by robbery.

Manner and Means

9. The defendants planned and agreed to conduct, conducted, and attempted to conduct, armed robberies of businesses and banks engaged in and affecting interstate commerce.

10. On April 17, 2021, the defendants committed an armed robbery of approximately \$3,334 in United States Currency at Check Into Cash in Moberly, Missouri.

11. On May 4, 2021, the defendants committed an armed robbery of approximately \$297 in United States Currency at World Finance in Mexico, Missouri.

12. On May 6, 2021, the defendants committed an armed robbery of approximately \$670 in United States Currency at Advance America in Marshall, Missouri.

13. On May 20, 2021, the defendants committed an armed robbery of approximately \$200 in United States Currency at Check N Go in Hannibal, Missouri.

14. On June 2, 2021, the defendants committed an armed robbery of approximately \$8,690 in United States Currency at Alliant Bank in Pilot Grove, Missouri.

15. On June 25, 2021, the defendants committed an armed robbery of approximately \$22,027 in United States Currency at Alliant Bank in Booneville, Missouri.

16. These armed robberies, including the Hobbs Act robbery charged in Count 2 and the bank robberies charged in Counts 4 and 6 involved the unlawful taking of United States currency from the presence of employees, against their individual wills, by means of actual and threatened force, violence, fear of injury, immediate and future, to their persons or property.

17. Each armed robbery involved the active employment and brandishing of a firearm pointed directly at employees, including the brandishing of a firearm during and in relation to the Hobbs Act robbery charged in Count 2 and the bank robberies charged in Counts 4 and 6.

18. Two of these armed robberies also involved the use of physical restraints to immobilize employees of World Finance in Mexico, Missouri, and Check ‘n Go, in Hannibal, Missouri.

19. All contrary to the provisions of and in violation of Title 18, United States Code, Sections 1951(a).

COUNT 2
(Interference with Commerce by Robbery – Hobbs Act)
18 U.S.C. § 1951(a)

20. On or about May 6, 2021, within Saline County, in the Western District of Missouri, the defendants, **(01) DRAKE ADAM STOCKTON-KENNEY**, a/k/a “Drake Adam Kenney,” “Draco Kenney,” “Drake Kenney,” “Draco Live,” and “Drizzy,” and **(02) MARY CATHERINE SUMPTER**, a/k/a “Catie Sumpter,” aiding and abetting each other, obstructed, delayed and affected commerce and the movement of articles and commodities in commerce by robbery, as those terms are defined in Title 18, United States Code, Section 1951, in that the defendants unlawfully took and obtained personal property, that is, United States currency, from the presence of M.B., R.R., and M.S., against their individual wills, by means of actual and threatened force, violence, fear of injury, immediate and future, to their person or property, that is, by pointing a firearm at M.B., R.R., and M.S.; all in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT 3
(Brandishing a Firearm During and in Relation to a Crime of Violence)
18 U.S.C. § 924(c)(1)(A)(ii)

21. On or about May 6, 2021, said date being approximate, within Saline County, in the Western District of Missouri, the defendant, **(01) DRAKE ADAM STOCKTON-KENNEY**, a/k/a “Drake Adam Kenney,” “Draco Kenney,” “Drake Kenney,” “Draco Live,” and “Drizzy,” during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, the Hobbs Act robbery as charged in Count 2 of this Indictment, knowingly used and brandished a firearm; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT 4
(Bank Robbery)
18 U.S.C. § 2113(a) and (d)

22. On or about June 2, 2021, said date being approximate, within Cooper County, in the Western District of Missouri, the defendants, **(01) DRAKE ADAM STOCKTON-KENNEY**, a/k/a “Drake Adam Kenney,” “Draco Kenney,” “Drake Kenney,” “Draco Live,” and “Drizzy,” and **(02) MARY CATHERINE SUMPTER**, a/k/a “Catie Sumpter,” aiding and abetting each other, by force, violence and intimidation, attempted to take from the person and presence of an employee of Alliant Bank, United States currency belonging to and in the care, custody, control, management and possession of Alliant Bank, the deposits of which then were insured by the Federal Deposit Insurance Corporation, and in committing such offense, the defendant, **(01) DRAKE ADAM STOCKTON-KENNEY**, a/k/a “Drake Adam Kenney,” “Draco Kenney,” “Drake Kenney,” “Draco Live,” and “Drizzy,” assaulted and put in jeopardy the life of another person by the use of a dangerous weapon, that is, a firearm; all in violation of Title 18 United States Code, Section 2113(a), 2113(d), and 2.

COUNT 5
(Brandishing a Firearm During and in Relation to a Crime of Violence)
18 U.S.C. § 924(c)(1)(A)(ii)

23. On or about June 2, 2021, said date being approximate, within Cooper County, in the Western District of Missouri, the defendant, **(01) DRAKE ADAM STOCKTON-KENNEY**, a/k/a “Drake Adam Kenney,” “Draco Kenney,” “Drake Kenney,” “Draco Live,” and “Drizzy,” during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, bank robbery as charged in Count 4 of this Indictment, knowingly used and brandished a firearm; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT 6
(Bank Robbery)
18 U.S.C. § 2113(a) and (d)

24. On or about June 25, 2021, said date being approximate, within Cooper County, in the Western District of Missouri, the defendants, **(01) DRAKE ADAM STOCKTON-KENNEY**, a/k/a “Drake Adam Kenney,” “Draco Kenney,” “Drake Kenney,” “Draco Live,” and “Drizzy,” and **(02) MARY CATHERINE SUMPTER**, a/k/a “Catie Sumpter,” by force, violence and intimidation, attempted to take from the person and presence of an employee of Alliant Bank, United States currency belonging to and in the care, custody, control, management and possession of Alliant Bank, the deposits of which then were insured by the Federal Deposit Insurance Corporation, and in committing such offense, the defendant, **(01) DRAKE ADAM STOCKTON-KENNEY**, a/k/a “Drake Adam Kenney,” “Draco Kenney,” “Drake Kenney,” “Draco Live,” and “Drizzy,” assaulted and put in jeopardy the life of another person by the use of a dangerous weapon, that is, a firearm; all in violation of Title 18, United States Code, Sections 2113(a), 2113(d), and 2.

COUNT 7
(Brandishing a Firearm During and in Relation to a Crime of Violence)
18 U.S.C. § 924(c)(1)(A)(ii)

25. On or about June 25, 2021, said date being approximate, within Cooper County, in the Western District of Missouri, the defendant, **(01) DRAKE ADAM STOCKTON-KENNEY**, a/k/a “Drake Adam Kenney,” “Draco Kenney,” “Drake Kenney,” “Draco Live,” and “Drizzy,” during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, bank robbery as charged in Count 6 of this Indictment, knowingly used and brandished a firearm; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT 8
(Felon in Possession of a Firearm)
18 U.S.C. § 922(g)(1)

26. On or about August 10, 2021, within Boone County, in the Western District of Missouri, the defendant, **(01) DRAKE ADAM STOCKTON-KENNEY**, a/k/a “Drake Adam Kenney,” “Draco Kenney,” “Drake Kenney,” “Draco Live,” and “Drizzy,” knowing he had previously been convicted of a crime punishable for a term exceeding one year, knowingly possessed, in and affecting commerce, a firearm, that is, a Taurus G2C 9mm pistol, serial number ABE603762; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

FORFEITURE ALLEGATION
(Criminal Forfeiture)
18 USC § 981(a)(1)(C) & 28 USC § 2461

27. The allegations contained in Counts 1, 2, 4, and 6, of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461.

28. Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, upon conviction of an offense in violation of Title 18, United States

Code, Sections 1951(a) and 2113, the defendants, **(01) DRAKE ADAM STOCKTON-KENNEY**, a/k/a “Drake Adam Kenney,” “Draco Kenney,” “Drake Kenney,” “Draco Live,” and “Drizzy,” and **(02) MARY CATHERINE SUMPTER**, a/k/a “Catie Sumpter,” shall forfeit to the United States of America any property constituting, or derived from, proceeds traceable to the violations contained in Counts 1, 2, 4, and 6, of this Indictment.

29. The property to be forfeited includes, but is not limited to, the following:

Money Judgment

30. A sum of money equal to the amount of United States currency obtained by each defendant involved in Count 1, the conspiracy to commit a violation of Title 18, United States Code, Section 1951(a), Count 2, the Interference with Commerce by Robbery – Hobbs Act, and Counts 4 and 6, Bank Robbery, for which a defendant is convicted.

Substitute Assets

31. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

/s/ Casey Castrop

FOREPERSON OF THE GRAND JURY

/s/ Michael S. Oliver

MICHAEL S. OLIVER

Assistant United States Attorney

Missouri Bar No. 41832

Dated: March 15, 2022